Order Type:

1660 Agreed Order

Findings Order Justification:

N/A

Media:

MWD

Small Business:

Yes

Location(s) Where Violation(s) Occurred:

Jacintoport Industrial Development WWTP, located in the Jacintoport Industrial Development, approximately 1.5 miles southwest of the confluence of the Houston Ship Channel and Carpenter's Bayou in the eastern part of Harris County

Type of Operation:

Wastewater treatment plant

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: April 24, 2015

Comments Received: No

Penalty Information

Total Penalty Assessed: \$34,675

Amount Deferred for Expedited Settlement: \$6,935 **Amount Deferred for Financial Inability to Pay:** \$0

Total Paid to General Revenue: \$790 Total Due to General Revenue: \$26,950 Payment Plan: 35 payments of \$770 each

Supplemental Environmental Project ("SEP") Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - Satisfactory Site/RN - Satisfactory

Major Source: No

Statutory Limit Adjustment: N/A **Applicable Penalty Policy:** April 2014

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: August 21, 2014 and August 26, 2014

Date(s) of NOE(s): October 3, 2014

Violation Information

- 1. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, while appurtenances were installed in the onsite lift station for a second lift pump, a second lift pump was not provided [30 Tex. Admin. Code § 305.125(1) and (5), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0012318001, Operational Requirements No. 1].
- 2. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the reduced-pressure principal backflow prevention assembly ("RPBA") was leaking [30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001, Operational Requirements No. 1].
- 3. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained. Specifically, the sludge blanket level in the clarifier was six feet in a total water depth of nine feet; the crossbeam supporting the clarifier drive was rusted through; the chlorine contact basin contained one foot of sludge in a total water depth of eight feet; the aeration basin had approximately eight inches of freeboard; the access walkway was equipped with a handrail on only one side of the catwalk; the existing handrail did not have a midrail; and the backup blower was inoperable [30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001, Operational Requirements No. 1].
- 4. Failed to prevent the unauthorized discharge of wastewater into or adjacent to any water in the state. Specifically, a valve on the clarifier drain pipe was leaking wastewater onto the ground [Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001, Permit Conditions No. 2.g and Operational Requirements No. 1].
- 5. Failed to comply with permitted effluent limits for chlorine residual, dissolved oxygen, and *Enterococci* [Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and TPDES Permit No. WQ0012318001, Effluent Limitations and Monitoring Requirements Nos. 1, 2, and 6].

- 6. Failed to retain monitoring and reporting records at the Facility or make them readily available for review by a TCEQ representative. Specifically, laboratory reports and operator logs from the months of November 2013 and March 2014 and the certificate for the Facility's RPBA were not provided for review [30 Tex. Admin. Code §§ 305.125(1) and (11)(b) and 319.7(c), and TPDES Permit No. WQ0012318001, Monitoring and Reporting Requirements No. 3.b].
- 7. Failed to timely submit discharge monitoring reports ("DMRs") at the intervals specified in the permit. Specifically, the DMRs for the monitoring periods ending November 30, 2013; January 31, 2014; February 28, 2014; March 31, 2014; and April 30, 2014 were not submitted by the 20th day of the following month [30 Tex. ADMIN. CODE §§ 305.125(1) and (17), and 319.7(d), and TPDES Permit No. WQ0012318001, Monitoring and Reporting Requirements No. 1].
- 8. Failed to accurately complete DMRs. Specifically, the Respondent failed to report data for daily average flow; daily maximum flow; minimum chlorine residual; and maximum chlorine residual on the DMR that was submitted for the monitoring period ending March 31, 2014 [30 Tex. ADMIN. CODE §§ 305.125(1) and (17), and 319.1, and TPDES Permit No. WQ0012318001 Monitoring and Reporting Requirements No. 1].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The Respondent has implemented the following corrective measures:

- a. On May 22, 2014, submitted the DMRs for the monitoring periods ending November 30, 2013; January 31, 2014; February 28, 2014; March 31, 2014; and April 30, 2014.
- b. By October 10, 2014, installed an additional lift station pump in the onsite lift station to ensure firm pumping capacity.
- c. By October 13, 2014, removed and properly disposed of the sludge in the chlorine contact basin.
- d. By October 21, 2014, replaced the reduced-pressure principal backflow prevention assembly ("RPBA").
- e. By October 22, 2014, the new RPBA was inspected, tested and certified as passing by a licensed backflow assembly tester.
- f. By November 3, 2014, installed a new backup blower.

g. By November 13, 2014, replaced the leaking valve on the clarifier drain pipe; properly disposed of wastewater that had leaked around the clarifier drain pipe; and disinfected the area; and

h. On November 18, 2014, submitted a revised DMR that included the values for daily average flow; daily maximum flow; minimum chlorine residual; and maximum chlorine residual for the monitoring period ending March 31, 2014.

Technical Requirements:

The Order will require the Respondent to:

- a. Within 30 days, update the Facility's operational guidance and conduct employee training to ensure that:
- i. Monitoring and reporting records, including operator logs and laboratory reports, are maintained in a manner so that they are readily available for review by TCEQ representatives upon request;
- ii. Self-reporting requirements are properly accomplished, including the timely submittal of complete and accurate DMRs; and
- iii. Sludge in the chlorine contact basin is removed and properly disposed of.
- b. Within 45 days, submit written certification of compliance with a.
- c. Within 60 days, develop and implement a solids management plan ("SMP"). The SMP shall include a program of internal process control testing to monitor the efficiency of the Facility and to maintain the proper solids balance. The SMP shall provide procedures designed as guidance for the operator to act on as a result of process control tests, to properly adjust the solids balance, and to determine sludge wasting rates. The SMP shall be prepared by a registered Texas Professional Engineer or an "A" TCEQ Certified Wastewater Operator.
- d. Within 75 days, submit written certification of compliance with c. including a copy of the SMP.
- e. Within 150 days:
- i. Submit written certification of compliance with the permitted effluent limits of TPDES Permit No. WQ0012318001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported

discharge monitoring reports, demonstrating at least three consecutive months of compliance with the permitted effluent limits;

- ii. Begin maintaining a minimum of eighteen inches of freeboard in the aeration basin;
- iii. Repair or replace the crossbeam supporting the clarifier drive; and
- iv. Install an additional handrail to the access walkway of the aeration basin and install a midrail for the existing handrail.
- f. Within 165 days, submit written certification of compliance with e.ii through e.iv.

Litigation Information

Date Petition(s) Filed: N/A Date Answer(s) Filed: N/A SOAH Referral Date: N/A Hearing Date(s): N/A Settlement Date: N/A

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Jill Russell, Enforcement Division, Enforcement Team 3, MC 169, (512) 239-4564; Candy Garrett, Enforcement Division, MC 219, (512)

239-1456

TCEQ SEP Coordinator: N/A

Respondent: Frank H. Hamilton, III, Manager, Quarters, LLC, P.O. Box 1886,

Wilmington, North Carolina 28402 Respondent's Attorney: N/A

Penalty Calculation Worksheet (PCW) Policy Revision 4 (April 2014) PCW Revision March 26, 2014 DATES Assigned 6-Oct-2014 PCW 31-Jan-2015 Screening 8-Oct-2014 **EPA** Due RESPONDENT/FACILITY INFORMATION Respondent Quarters, LLC Reg. Ent. Ref. No. RN101517589 Facility/Site Region 12-Houston Major/Minor Source Minor CASE INFORMATION Enf./Case ID No. 49461 Docket No. 2014-1498-MWD-E No. of Violations 8 Order Type 1660 Media Program(s) Water Quality Government/Non-Profit No Multi-Media Enf. Coordinator Jill Russell EC's Team Enforcement Team 3 \$0 Maximum \$25,000 Admin. Penalty \$ Limit Minimum Penalty Calculation Section TOTAL BASE PENALTY (Sum of violation base penalties) \$30,250 ADJUSTMENTS (+/-) TO SUBTOTAL 1 Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage. Compliance History 20.0% Enhancement Subtotals 2, 3, & \$6,050 Enhancement for one order with denial. Notes 0.0% Enhancement Subtotal 4 \$0 Culpability No The Respondent does not meet the culpability criteria. Notes

Subtotal 5

Final Subtotal

Final Penalty Amount

Final Assessed Penalty

20.0% Reduction Adjustment

Adjustment

0.0% Enhancement* Subtotal 6

0.0%

*Capped at the Total EB \$ Amount

-\$1,625

\$34,675

\$34,675

\$34,675

-\$6,935

\$27,740

\$0

\$0

Good Faith Effort to Comply Total Adjustments

\$888

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only, e.g. 20 for 20% reduction.)

Deferral offered for expedited settlement.

Economic Benefit

Notes

Notes

STATUTORY LIMIT ADJUSTMENT

Total EB Amounts

Estimated Cost of Compliance

OTHER FACTORS AS JUSTICE MAY REQUIRE

Reduces or enhances the Final Subtotal by the indicated percentage.

DEFERRAL

PAYABLE PENALTY

SUM OF SUBTOTALS 1-7

Screening Date 8-Oct-2014

Respondent Quarters, LLC Case ID No. 49461

Reg. Ent. Reference No. RN101517589 Media [Statute] Water Quality

Enf. Coordinator Jill Russell

Policy Revision 4 (April 2014) PCW Revision March 26, 2014

Component	ry <i>Site</i> Enhancement (Subtotal 2) Number of	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	0	0%
::	Other written NOVs	0	0%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1 ;	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgments or consent decrees meeting criteria)	0	0%
Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
Audits	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
		ase Enter Yes or No	T
.*	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment Per	centage (Sub	total 2)
peat Violator (
No	Adjustment Per	centage (Sub	total 3)
mpliance Histo	ry Person Classification (Subtotal 7)		
Satisfactory	Performer Adjustment Per	centage (Sub	total 7)
mpliance Histo	ry Summary		
Compliance History Notes	Enhancement for one order with denial.		
	Total Compliance History Adjustment Percentage (S	Subtotals 2,	3, & 7) [
ii Compliance F	listory Adjustment Final Adjustment Percent		

_ *	PCW
Reg. Ent. Reference No. RN101517589	icy Revision 4 (April 2014)
	V Revision March 26, 2014
Enf. Coordinator Jill Russell	
Violation Number 1	
Rule Cite(s) 30 Tex. Admin. Code § 305.125(1) and (5), and Texas Pollutant Discharge	7
Elimination System ("TPDES") Permit No. WQ0012318001, Operational	:
Requirements No. 1	
	
Failed to ensure that the Facility and all of its systems of collection, treatment, an disposal are properly operated and maintained, as documented during an	u
Violation Description investigation conducted on August 21, 2014. Specifically, while appurtenances	
were installed in the onsite lift station for a second lift pump, a second lift pump	
was not provided.	
Base Penalt	y \$25,000
>> Environmental, Property and Human Health Matrix	
Harm Release Major Moderate Minor	
Release Major Moderate Minor OR Actual	
Potential X Percent 15.0%	
>>Programmatic Matrix Falcification Major Medarate Minor	
Falsification Major Moderate Minor Percent 0.0%	
1 dicent 0.070	
Matrix Human health or the environment will or could be exposed to pollutants that would exceed level Notes that are protective of human health or environmental receptors as a result of the violation.	S
Notes that are protective of numerical receptors as a result of the violation.	
	· ·
Adjustment \$21,25	<u>0</u> 0]
	\$3,750
V= 1 - C F E.	
Violation Events	
Number of Violation Events 2 48 Number of violation days	
daily	
weekly monthly X	
mark only one quarterly Violation Base Penalt	\$7,500
semiannual	***************************************
annual	
single event	
	7
Two monthly events are recommended calculated from the first date of the investigation, Augus 21, 2014, to the October 8, 2014 screening date.	t
21, 2014, to the October 8, 2014 Screening date.	
	n \$750
6. J. 6. 11 F. 6. 11 J. 6. 11	n \$750
Good Faith Efforts to Comply 10.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Good Faith Efforts to Comply 10.0% Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary X Ordinary X N/A (mark with x) The Respondent achieved compliance on October 10	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary X	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A (mark with x) Notes The Respondent achieved compliance on October 10,	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A (mark with x) Notes The Respondent achieved compliance on October 10,	al \$6,750
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A (mark with x) The Respondent achieved compliance on October 10, 2014. Violation Subtota	al \$6,750
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A Notes The Respondent achieved compliance on October 10, 2014. Violation Subtota Economic Benefit (EB) for this violation Statutory Limit Test	
Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary Ordinary N/A (mark with x) The Respondent achieved compliance on October 10, 2014. Violation Subtota	al \$8,250

	E.(conomic	benent	WO	rksneet		
Respondent	Quarters, LLC		200000000000000000000000000000000000000				411111111111111111111111111111111111111
Case ID No.	49461						
ea, Ent. Reference No.	RN101517589						
- 	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
	-					5.0	15
	** * * *						
		Date Required	Final Date	115	interest Saveo	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment	\$10,000	21-Aug-2014	10-Oct-2014	0.14	\$5	\$91	\$96
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs							
	<u> </u>			0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0.	n/a	\$0
Other (as needed) Notes for DELAYED costs		first date of	the investigatio	nd lift in the	\$0 pump in the onsite Final Date is the c	ri/a e lift station. Date R ompliance date.	\$0 sequired is the
Other (as needed) Notes for DELAYED costs Avoided Costs		first date of	the investigatio	0.00 nd lift _l n. The	\$0 pump in the onsite Final Date is the c ng item (except	ri/a Inft station. Date Rompliance date. for one-time avoid	\$0 sequired is the
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal		first date of	the investigatio	nd lift n. The enterin 0.00	\$0 pump in the onsite Final Date is the c ng item (except \$0	ri/a hift station. Date Rompliance date. for one-time avoid	\$0 sequired is the sided costs)
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel		first date of	the investigatio	nd lift n. The enterin 0.00 0.00	\$0 pump in the onsite Final Date is the c ng item (except \$0 \$0	n/a e lift station. Date R ompliance date. for one-time avoid \$0 \$0	\$0 sequired is the ded costs) \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel aspection/Reporting/Sampling		first date of	the investigatio	0.00 nd lift n. The enterin 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the conglitem (except \$0 \$0 \$0	ri/a e lift station. Date R ompliance date. for one-time avoid \$0 \$0 \$0	\$0 sequired is the ded costs) \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment		first date of	the investigatio	0.00 nd lift n. The enterin 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the congitem (except \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0	\$0 sequired is the sequired in
Other (as needed) Notes for DELAYED costs Disposal Personnel rspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]		first date of	the investigatio	0.00 nd lift n. The enteria 0.00 0.00 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the congitem (except \$0 \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 lequired is the led costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]		first date of	the investigatio	0.00 nd lift n. The enteria 0.00 0.00 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the c ng item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 dequired is the sequired i
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]		first date of	the investigatio	0.00 nd lift n. The enteria 0.00 0.00 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the congitem (except \$0 \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0	\$0 ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]		first date of	the investigatio	0.00 nd lift n. The enteria 0.00 0.00 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the c ng item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 dequired is the sequired is
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		first date of	the investigatio	0.00 nd lift n. The enteria 0.00 0.00 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the c ng item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 dequired is the sequired is
Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)		first date of	the investigatio	0.00 nd lift n. The enteria 0.00 0.00 0.00 0.00 0.00	\$0 pump in the onsite Final Date is the c ng item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	ri/a e lift station. Date R compliance date. for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 dequired is the sequired is

Screening Date Respondent		Docket No. 2014-1498-MWD-E	PCW
Case ID No.			v Revision 4 (April 2014) Revision March 26, 2014
Reg. Ent. Reference No.			
Media [Statute] Enf. Coordinator			
Violation Number			
Rule Cite(s)		. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001,]
	30 Tex. Admin.	Operational Requirements No. 1	
Violation Description	disposal a investigation	re that the Facility and all of its systems of collection, treatment, and are properly operated and maintained, as documented during an conducted on August 21, 2014. Specifically, the reduced-pressure cipal backflow prevention assembly ("RPBA") was leaking.	
		Base Penalty	\$25,000
>> Environmental, Prope	rty and Hum	an Health Matrix	
		Harm	
Release OR Actual	(Moderate Minor	
Potential		Percent 15.0%	1
>>Programmatic Matrix Falsification	Major	Moderate Minor	
raisincation	Major	Percent 0.0%	
<u> </u>			
Matrix Human healt	th or the environ	ment will or could be exposed to pollutants that would exceed levels	
		nan health or environmental receptors as a result of the violation.	
		Adjustment \$21,250	1
***************************************			\$3,750
Violation Events			43,730
Number of N	Violation Events	2 A8 Number of violation days	
mark only one with an x	daily weekly monthly quarterly semiannual annual single event	X Violation Base Penalty	\$7,500
Two monthly		mmended calculated from the first date of the investigation, August 014, to the October 8, 2014 screening date.	
Good Faith Efforts to Com		10.0% Reduction efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	\$750
	Extraordinary	NOC/NOV to EDTRY/Settlement Offer	
9000000	Ordinary	X	
PARTITION	N/A	(mark with x)	
	Notes	The Respondent achieved compliance on October 22, 2014.	***************************************
		Violation Subtotal	\$6,750
Economic Benefit (EB) for	this violatic	n Statutory Limit Test	
Estimate	ed EB Amount[\$6 Violation Final Penalty Total	\$8,250
	است. - است. است او او دود دود دود دود دود و رود و و دود و	This violation Final Assessed Penalty (adjusted for limits)	\$8,250

	E	conomic	Benefit	Wo	rksheet		
Respondent	Ouarters, LLC			004444444	438648483886688888888888888888888888888		*******************************
Case ID No.	- ,						
Reg. Ent. Reference No.							
•	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
violation No.	2						Dehieciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
:					*******************************		
Delayed Costs							
Equipment	\$500	21-Aug-2014	22-Oct-2014	0.17	\$0	\$6	\$6
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land		<u> </u>		0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0		\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs	<u></u>			0.00	\$0	n/a	\$0
Other (as needed)		L		0.00	\$0	n/a	\$0
						new RPBA inspected	
Notes for DELAYED costs	certified b				nbly tester. Date ite is the complian	Required is the first	date of the
		HIVE	sugation, me r	iliai Da	ite is trie compilan	ce date.	
Avoided Costs	ANNUAL	ZE [1] avoided	costs before	enterii	ng item (except	for one-time avoi	ded costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)		<u> </u>		0.00	\$0	\$0	\$0
	8						
Notes for AVOIDED costs							
Notes for Avoided costs							
•	***************************************						
Approx. Cost of Compliance		\$500			TOTAL		\$6
					44444	A	т1
							are and and parties are assumed and parties of parties or property and parties are a comparty and parties of the parties of th

Screening Date	8-Oct-2014 Docket No. 2014-1498-MWD-E	PCW
Respondent Case ID No.		icy Revision 4 (April 2014)
Reg. Ent. Reference No.		V Revision March 26, 2014
Media [Statute]		
Enf. Coordinator Violation Number	Jill Russell	
Rule Cite(s)	30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318003	
	Operational Requirements No. 1	
	Failed to ensure that the Facility and all of its systems of collection, treatment, and	
	disposal are properly operated and maintained, as documented during an investigation conducted on August 21, 2014. Specifically, the sludge blanket level	5
	the clarifier was six feet in a total water depth of nine feet; the crossbeam	11
Violation Description	supporting the clarifier drive was rusted through; the chlorine contact basin contained one foot of sludge in a total water depth of eight feet; the aeration basin	,
	had approximately eight inches of freeboard; the access walkway was equipped wit a handrail on only one side of the catwalk; the existing handrail did not have a	h
	midrail; and the backup blower was inoperable.	
	<u>La construccional de la construcción de la constru</u>	
	Base Penalt	y \$25,000
>> Environmental, Proper	ty and Human Health Matrix Harm	
Release OR Actual	Major Moderate Minor	
Potential	X Percent 15.0%	
>>Programmatic Matrix		
Falsification	Major Moderate Minor	
	Percent 0.0%	Transport
Matrix Human healt	h or the environment will or could be exposed to pollutants that would exceed levels	
Notes that are p	rotective of human health or environmental receptors as a result of the violation.	HITTOTAL
lan-manufactura de la constantina della constant	Adjustment \$21,25	0
	▼	\$3,750
		33,730
Violation Events		1 (-
Number of \	/iolation Events 2 48 Number of violation days	
	daily	
	monthly X	
mark only one with an x	quarterly Violation Base Penalt semiannual	y \$7,500
	annual	
	single event	
Two monthly	events are recommended calculated from the first date of the investigation, August	
	21, 2014, to the October 8, 2014 screening date.	
Good Faith Efforts to Com	ply 0.0% Reduction	\$0
	Before NOE/NOV NOE/NOV to EDPRP/Settlement Offer Extraordinary	≈
	Ordinary	deserronana
	N/A X (mark with x)	-
	Notes The Respondent does not meet the good faith criteria for this violation.	
	VIOLETINE VIOLETINE	Constitution
	Violation Subtota	\$7,500
Economic Benefit (EB) for	this violation Statutory Limit Test	
Estimate	ed EB Amount \$249 Violation Final Penalty Tota	\$9,000
	This violation Final Assessed Penalty (adjusted for limits	\$9,000

Economic Benefit Worksheet Respondent Quarters, LLC Case ID No. 49461 Reg. Ent. Reference No. RN101517589 Media Water Quality Years of **Percent Interest** Depreciation Violation No. 3 15 Item Cost Date Required **Final Date** Yrs Interest Saved **Onetime Costs EB** Amount Item Description No commas or \$ Delayed Costs \$10,450 Equipment 21-Aug-2014 3-Nov-2014 0.20 \$7 \$141 \$148 0.00 \$0 \$0 \$0 Other (as needed) 0.00 \$0 \$0 \$0 Engineering/Construction 0.00 \$0 \$0 \$0 0.00 Land \$0 n/a \$0 **Record Keeping System** 0.00 \$0 n/a \$0 Training/Sampling 0.00 \$0 \$0 n/a Remediation/Disposal \$6,500 21-Aug-2014 0.15 \$47 \$47 m/a **Permit Costs** 0.00 \$0 \$0 n/a 21-Aug-2014 16-Sep-2015 1.07 Other (as needed) \$54 \$54 n/a Estimated cost to replace the backup blower. Date Required is the first date of the investigation. The Final Date is the compliance date. Estimated cost to remove and properly dispose of sludge in the chlorine contact basin. Date Required is the first date of the investigation. The final date is the compliance date. Estimated cost to repair or replace the rusted clarifier crossbeam; install an additional handrail to the Notes for DELAYED costs access walkway and install a midrail for the existing handrall; begin maintaining at least 18 inches of freeboard in the aeration basin; and develop and implement a solids management plan ("SMP") and to maintain an appropriate quantity and quality of solids inventory according to accepted industry standards for process control. Dates Required are the first date of the investigation. The Final Date is the expected date of compliance. ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs) Avoided Costs Disposal 0.00 \$0 Personnel 0.00 \$0 \$0 \$0 Inspection/Reporting/Sampling 0.00 \$0 \$0 \$0 Supplies/Equipment 0.00 \$0 \$0 \$0 Financial Assurance [2] 0.00 \$0 <u>\$0</u> \$0 ONE-TIME avoided costs [3] 0.00 \$0 \$0 \$0 Other (as needed) 0.00 Notes for AVOIDED costs \$17,950 TOTAL \$249 Approx. Cost of Compliance

Scree	ening Date	8-Oct-2014	Docke	t No. 2014-1498-MWD-E	PCW
		Quarters, LLC			Policy Revision 4 (April 2014
Reg. Ent. Refe	ase ID No.				PCW Revision March 26, 2014
- \$33333333333333 33 33333333333333333333		Water Quality			
	oordinator	Jill Russell			
Viola	tion Number Rule Cite(s)	4 <u> </u> _			
	Ruie Cite(5)	lex. Water Cod		nin. Code § $305.125(1)$ and (5) Conditions No. 2.g and Operatio	
		TPDL3 FeIIIII	Requirements	- `	ntai
				of wastewater into or adjacent t	
Violation	Description			rvestigation conducted on Augu in pipe was leaking wastewater	
***			the ground	, ,	
		<u></u>			
***************************************				Base Pe	enalty \$25,000
>> Environmen	tal. Proper	tv and Huma	ın Health Matrix		
			Harm		
OR	Release Actual	Major	Moderate Minor		
	Potential			Percent 5.0%	
>>Programmat	ic Matrix				
~ ~ r r og r annmar	Falsification	Major	Moderate Minor		
				Percent 0.0%	
Matrix Notes	Human healt	th or the environ	ment has been exposed to insignent result of the violation.	gnificant amounts of pollutants	as a
Wotes		. it.	result of the violation.		
				Adjustment \$2	23,750
				***************************************	\$1,250
					<u> </u>
Violation Events	5				
-	Number of V	iolation Events	1 2	Number of violation days	5
	. 1	dally	<u> </u>		
		weekly			
	mark only one	monthly		Violation Page Pe	d1 250
	with an x	quarterly semiannual	X	Violation Base Pe	enalty \$1,250
		annual [
		single event			
	One quarterly	event is recomm	nended from the first date of th	e investigation, August 21, 201	4, to
333333333			the October 8, 2014 screening		
			10.00/		*****
Good Faith Effo	rts to Comp		10.0% ore NOE/NOV to EDPRP/S		iction \$125
		Extraordinary			
		Ordinary N/A	(mark with x)		
		Notes	The Respondent achieved company 2014.	· · · · · · · · · · · · · · · · · · ·	
-		L			
				Violation Sub	stotal \$1,125
Economic Benef	it (EB) for	this violation	1	Statutory Limit Te	st
		d EB Amount □	\$7]	Violation Final Penalty	
The state of the s		vanc		•	
			THIS VIOLATION FINAL ASSES	ssed Penalty (adjusted for lin	mits) \$1,375

	F.C	:onomic	Benefit	Wo	rksheet		
Respondent	Quarters, LLC			**********		***************************************	
Case ID No.	49461						
Reg. Ent. Reference No.	RN101517589						
Media	Water Quality					Percent Interest	Years of
Violation No.	4			latataratatatatara la sa		reitein interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment	\$100	21-Aug-2014	13-Nov-2014	0.23	\$0	\$2	\$2
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction Land				0.00	\$0 \$0	\$0 n/a	\$0 \$0
Record Keeping System				0.00	\$0 \$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0 \$0
Remediation/Disposal	\$500	21-Aug-2014	13-Nov-2014	0.23	\$6	n/a	\$6
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)				0.00	\$0	7/4	\$0
Notes for DELAYED costs	the investigation	on. Final Date is around the clarific	the compliance of er drain pipe and	date. I d disinf	Estimated cost to p	Date Required is the properly dispose of was Required is the findate.	vastewater that
Avaided Costs	ANNUAL	ZE [1] avoided	costs before	nteri	ng item (except	for one-time avoi	ded costs)
Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)			L	10.00	1	<u> </u>	<u> </u>
Notes for AVOIDED costs			1		: .		
Approx. Cost of Compliance		\$600		-vindpoint print in the links before beauty	TOTAL		\$7

green and the contract of the		8-Oct-2014	Docket No. 2014-1498-MWD-E	PCW
		Quarters, LLC		Revision 4 (April 2014)
Reg. Ent. Refe	se ID No.		PCW F	Revision March 26, 2014
		Water Quality		-
	ordinator			
\$ 1000 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	on Number	protection		
1	lule Cite(s)		do 5 26 121(5)(1) 20 Toy Admin Codo 5 205 125(1) and TDD50	
			ode § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and TPDES 0012318001, Effluent Limitations and Monitoring Requirements Nos.	
		7 6,7712 1101 110	1, 2, and 6	
		Failed to	comply with permitted effluent limits, as documented during an	
Violation	Description		conducted on August 21, 2014, and shown in the attached table.	
			Base Penalty	\$25,000
			base reliaity	\$23,000
>> Environment	al, Prope	rty and Hum		
	Dolonco	Major	Harm Moderate Minor	
OR	Release Actual	[Moderate Minor X Minor	
	Potential		Percent 15.0%	
		Learning to the second		
>>Programmati		<u>.</u> .		
F	Falsification	Major	Moderate Minor	
L			Percent 0.0%	
r,	luman healt	h or the environr	ment has been exposed to significant amounts of pollutants which do	
Matrix In			tective of human health or environmental receptors as a result of the	
Notes			violation.	
			Adjustment \$21,250	
				\$3,750
Violation Events				
	Number of '	Violation Events	1 Number of violation days	
		daily		
		weekly		
,	nark only one	monthly	XIII X	+2 750
	with an x	quarterly semiannual	Violation Base Penalty	\$3,750
		annual		
		single event		
		•		
			One monthly event is recommended.	
L				
Good Faith Effor	ts to Com	ply	0.0% Reduction	\$0
	***************************************	В	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer	
		Extraordinary		
		Ordinary		
		N/A	X (mark with x)	
		Notes	The Respondent does not meet the good faith criteria for	
		Noces	this violation.	
		Ī		
			Violation Subtotal	\$3,750
Economic Benefi	t (FR) for	this violatio	on Statutory Limit Test	
LEGITORNIC DENETI	. (LD) IOI	uns vivialit	m Statutory Limit Test	
	Estimat	ed EB Amount[\$515 Violation Final Penalty Total	\$4,500
			This violation Final Assessed Penalty (adjusted for limits)	\$4,500
			House i mai Assessed Fendity (adjusted 101 lilling)	φ4,500

		COMPANIE	Benefit	AAO	rksneet		
Respondent	Quarters, LLC					***************************************	
Case ID No.	49461						
ea. Ent. Reference No.	RN101517589						
	Water Quality						Years of
Violation No.						Percent Interest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs		. 1					
Other (as needed)	\$10,000 Estmate	21-Aug-2014	1-Sep-2015	0.00 1.03	\$0 \$515	n/a n/a	\$0 \$515
Other (as needed) Notes for DELAYED costs	Estmate	d cost to determin	ne the cause of fluent limits. Da	1.03 noncon ite Req	\$515 mpliance and take	n/a corrective actions to date of noncompliar	\$515 maintain
	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 noncon ite Req pected	\$515 npliance and take uired is the initial date of complianc	n/a corrective actions to date of noncompliar	\$515 o maintain nce. The Final
Notes for DELAYED costs	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 noncon ate Req pected enterin 0.00	\$515 mpliance and take uired is the initial date of compliance of item (except \$0	n/a corrective actions to date of noncompliar ie. for one-time avoi \$0	\$515 o maintain nce. The Final ded costs)
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 noncon ate Req pected enterii 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance in the initial date of compliance is a second compliance in the initial compl	n/a corrective actions to date of noncompliar e. for one-time avoid \$0 \$0	\$515 o maintain nce. The Final ded costs) \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	nonconte Requested entering 0.00 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance and item (except \$0 \$0 \$0	n/a corrective actions to date of noncompliar e. for one-time avoi \$0 \$0 \$0 \$0	\$515 Dimaintain Ince. The Final ded costs) \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 nonconste Requested enteris 0.00 0.00 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance and item (except \$0 \$0 \$0 \$0 \$0	n/a corrective actions to date of noncompliar e. for one-time avoides \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$515 Dimaintain Dice. The Final Ged costs \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 nonconate Req pected enteria 0.00 0.00 0.00 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance mg item (except \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	n/a corrective actions to date of noncompliar e. for one-time avoi- \$0 \$0 \$0 \$0 \$0 \$0	\$515 o maintain nce. The Final ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 nonconste Req pected enteria 0.00 0.00 0.00 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance and take in the initial date of compliance are so as a so a so a so a so a so a so a	n/a corrective actions to date of noncompliar e. for one-time avoi- \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$515 o maintain nce. The Final ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 nonconate Req pected enteria 0.00 0.00 0.00 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance and take in the initial date of compliance are so as a so a so a so a so a so a so a	n/a corrective actions to date of noncompliar e. for one-time avoi- \$0 \$0 \$0 \$0 \$0 \$0	\$515 c maintain nce. The Final ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estmated compliance	d cost to determing with permitted ef	ne the cause of fluent limits. Da Date is the ex	1.03 nonconste Req pected enteria 0.00 0.00 0.00 0.00 0.00	\$515 mpliance and take uired is the initial date of compliance and take in the initial date of compliance are so as a so a so a so a so a so a so a	n/a corrective actions to date of noncompliar e. for one-time avoi- \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$515 o maintain nce. The Final ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date		Docket No. 2014-1498-MWD-E		PCW
Respondent Case ID No.				Revision 4 (April 2014) vision March 26, 2014
Reg. Ent. Reference No.			- FCW Ke	VISION MATCH 20, 2014
Media [Statute]				
Enf. Coordinator Violation Number				
Rule Cite(s)		5 435(1) - 1 (11)(5) - 1 310 7(1) - 1 7505		
	1	05.125(1) and (11)(B) and 319.7(c), and TPDE Monitoring and Reporting Requirements No. 3	11	
Violation Description	readily available for review investigation conducted or laboratory reports and opera	ng and reporting records at the Facility or make w by a TCEQ representative, as documented du in August 21, 2014 and August 26, 2014. Spec ator logs from the months of November 2013 a	ring an ifically, nd March	
	2014 and the certificate	for the Facility's RPBA were not provided for re	Penalty	\$25,000
	<u>.</u>		remaily_	\$23,000
>> Environmental, Prope	rty and Human Health Harm	Matrix		
Release	Major Moderate	Minor		
OR Actual Potential		Percent 0.0%		
>>Programmatic Matrix Falsification	Major Moderate	Minor		
) ×	Percent 5.0%		
			1	
Matrix Notes	100% of the rule	e requirements were not met.		
		Adjustment	\$23,750	
				\$1,250
Violation Events			_	
Number of	Violation Events 1	Number of violation of	iays	
	dally			
	weekly monthly			
mark only one with an x	quarterly	Violation Base	Penalty	\$1,250
William	semiannual			
	annual X			
[
	One single	event is recommended.		
<u>Landing</u>				
Good Faith Efforts to Com			Reduction	\$0
	Before NOE/NOV Extraordinary	NOE/NOV to EDPRP/Settlement Offer		
***************************************	Ordinary			
THE THE PARTY OF T	N/A X	(mark with x)		
The state of the s	Notes The Respond	dent does not meet the good faith criteria for this violation.		
***************************************		Violation	Subtotal -	\$1,250
Economic Benefit (EB) for	r this violation	Statutory Limit	Tect	
				£1 F00
Estimat	ed EB Amount	\$11 Violation Final Pena		\$1,500
	This vio	olation Final Assessed Penalty (adjusted fo	r iimits)[_	\$1,500

	Ec	conomic	Deneni		rksneet		
Respondent	-						
Case ID No.							
eg. Ent. Reference No.							
	Water Quality					Percent Interest	Years of
Violation No.	6						Depreciation
						5.0	15
		Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
				0.00	\$0	n/a	\$0
Record Keeping System	1050	21-Aug-2014	18-Jul-2015	0.91	\$11	ri/a	\$11
Record Keeping System Training/Sampling	\$250	LAL MUU LULT					
	\$250	21 700 2017	10 301 2019	0.00	\$0	n/a	\$0
Training/Sampling	<u>\$250</u>	21 Add 2017		0.00	\$0	n/a	
Training/Sampling Remediation/Disposal	Estimated cos	t to update the F	acility's operation	0.00 0.00 0.00 onal gu	\$0 \$0 \$0 dance and conductions and laborato	n/a n/a n/a tt employee training ry reports are readi	\$0 \$0 to ensure that ly available for
Training/Sampling Remediation/Disposal Permit Costs	Estimated cos monitoring ar review by TCE including the	t to update the Fand reporting recoil Q representative timely submittal	acility's operation rds, including op s upon request of complete and	0.00 0.00 0.00 onal gu perator and se	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more	n/a n/a n/a ct employee training	\$0 \$0 to ensure that ly available for accomplished, te Required is
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 onal gu perator and se d accur Final I	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more Date is the expector	n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da	\$0 \$0 to ensure that ly available for accomplished, te Required is ce.
Training/Sampling Remediation/Disposal Permit Costs Other (as needed)	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 onal gu perator and se d accur Final I	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more pate is the expected ing item (except	n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid	\$0 \$0 to ensure that ly available for accomplished, te Required is ce.
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 onal gu perator and se d accur Final I	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more to bate is the expector	n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid	\$0 \$0 to ensure that ly available for accomplished, te Required is ce.
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	onal guberator and sed accurring [0.00]	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more pate is the expected ing item (except	n/a n/a n/a n/a t employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliand for one-time avoid	\$0 \$0 to ensure that ly available for accomplished, te Required is ce. ded costs) \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	onal guberatoriand sed accurrent l	\$0 \$0 \$0 dance and conductings and laboratoricate discharge more to the expected of the expect	n/a n/a n/a n/a n/a ret employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid \$0 \$0 \$0 \$0 \$0	\$0 \$0 to ensure that ly available for accomplished, te Required is ce. ded costs) \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel espection/Reporting/Sampling	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 0.00 onal gu perator and se d accur Final I 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more cate is the expecte ing item (except \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 to ensure that ly available for accomplished, te Required is ce. ded costs) \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 onal gu perator and se d accur Final I 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 dance and conductings and laboratoricate discharge more to the expected of the expect	n/a n/a n/a n/a n/a ret employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid \$0 \$0 \$0 \$0 \$0	\$0 \$0 to ensure that ly available for accomplished, te Required is ce. ded costs) \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 0.00 onal gu perator and se d accur Final I 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 idance and conduct logs and laborato if-reporting require ate discharge more cate is the expecte ing item (except \$0 \$0 \$0 \$0 \$0 \$0	n/a n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 to ensure that ly available for accomplished, te Required is ce. ded costs) \$0 \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 onal gu perator and se d accur Final I 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 dance and conductions and laboratoriate discharge more pate is the expected solutions and the expected solutions are solutions and the expected solutions and the expected solutions are solutions.	n/a n/a n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 to ensure that ly available for accomplished, the Required is ce. ded costs) \$0 \$0 \$0 \$0
Training/Sampling Remediation/Disposal Permit Costs Other (as needed) Notes for DELAYED costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated cos monitoring ar review by TCE including the th	t to update the Fand reporting reco Q representative timely submittal ne first date of the	acility's operation rds, including op supon request of complete and e investigation.	0.00 0.00 0.00 onal gu perator and se d accur Final I 0.00 0.00 0.00 0.00 0.00	\$0 \$0 \$0 dance and conductions and laboratoriate discharge more pate is the expected solutions and the expected solutions are solutions and the expected solutions and the expected solutions are solutions.	n/a n/a n/a n/a n/a n/a tt employee training ry reports are readi ements are properly nitoring reports. Da ed date of compliance for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 to ensure that ly available for accomplished, the Required is ce. ded costs) \$0 \$0 \$0 \$0

Scre	ening Date	8-Oct-2014	Docket No. 2014-1498-MWD-E	***************************************	PCW
	espondent		portuguosasa indicata da a ri riberta de a secución de	Policy	Revision 4 (April 2014)
	ase ID No.			PCW R	evision March 26, 2014
Reg. Ent. Ref					
	a [Statute] 'oordinator				
	ation Number	7	· .		
	Rule Cite(s)	20 Tay Admin	Code §§ 305.125(1) and (17), and 319.7(d), and TPDES F	Pormit No	2
			012318001, Monitoring and Reporting Requirements No. 1		***************************************

			nely submit discharge monitoring reports ("DMRs") at the in		***************************************
Violatio	n Description		permit, as documented during an investigation conducted August 26, 2014. Specifically, the DMRs for the monitoring		***************************************
			er 30, 2013; January 31, 2014; February 28, 2014; March		141104444
		and April 30,	2014 were not submitted by the 20th day of the following	month.	
		<u> </u>		السمسسسس	
			Bas	e Penalty	\$25,000
>> Environme	ntal, Propei	rty and Hum	an Health Matrix		PERMIT
	Release	Major	Harm Moderate Miner		na n
OR	Actual		Moderate Minor		
	Potential		Percent 0.0%		
>>Programma	Falsification	Major	Moderate Minor		
			X Percent 1.0%		***************************************
	r			<u>1</u>	
Matrix		More t	han 70% of the rule requirements were met.		
Notes		Mote c	man 70 % of the fale requirements were met.		
	<u> </u>				ancourant apr
			Adjustment	\$24,750	1
				[\$250
Violation Event	re.				A
	Number of \	Violation Events	5 Number of violation	days	***************************************
		daily			
		weekly			
	mark only one	monthly	Violation Bas	o Bonaltu	\$1,250
	with an x	quarterly semiannual	Violation bas	e Pellaity	91,230
		ennual			HILIMANIA
	-	single event	X		анимини
***************************************				1	
		Five single e	vents are recommended (one for each late report).		
L				لسسس	THE STATE OF THE S
Good Faith Effo	orts to Com	ply	0.0%	Reduction	\$0
		T==	efore NOE/NOV NOE/NOV to EDPRP/Settlement Offer		
		Extraordinary Ordinary			
		N/A	X (mark with x)		
The state of the s		Î	The Respondent does not meet the good faith criteria for	l	
		Notes	this violation.	I	
THE PERSON NAMED IN COLUMN NAM		L		•	
			Violation	Subtotal	\$1,250
Economic Bene	fit (EB) for	this violatio	n Statutory Limit	Test	
				_	
Trivian man	Estimate	ed EB Amount	\$3 Violation Final Pen	_	\$1,500
			This violation Final Assessed Penalty (adjusted f	or limits)	\$1,500

	Ec	conomic	Benefit	Wo	rksheet		
Respondent							
Case ID No.	- '						
Reg. Ent. Reference No.							
							V
	Water Quality					Percent Interest	Years of
Violation No.	7			enn an elektricke			Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
######################################	***************************************		\$2000 EEE 4000000000000000000000000000000	**********	440000000000000000000000000000000000000		\$\$\$\$\$\$\$\$##############################
Delayed Costs							
Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs Other (as needed)	\$125	20.0 - 2012	22-May-2014	0.00	\$0 \$3	n/a n/a	\$0 \$3
Notes for DELAYED costs	deliquent DMF update the	R was due. The Fi Facility's operation	nal Date is the conal guidance ar	late the	e deliquent DMRs duct employee trai	Required is the date were submitted. Es ning to ensure that ic Benefit of Violatio	timated cost to all reporting
Avoided Costs	ANNUAL	IZE [1] avoided	casts before	nterii	na item / except	for one-time avoi	ded costs)
Disposal	<u> </u>		·	0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$125			TOTAL		\$3

Screening Date		Docket No	. 2014-1498-MWD-E	PCW
Respondent Case ID No.				Policy Revision 4 (April 2014)
Reg. Ent. Reference No.				PCW Revision March 26, 2014
Media [Statute]				
Enf. Coordinator	Jill Russell			***************************************
Violation Number				المحص
Rule Cite(s)	30 Tex. Admin. Co	ode §§ 305.125(1) and (17), and 318001 Monitoring and Reportin		No.
Violation Description	conducted on Augu failed to report dat	ately complete DMRs, as docume ust 21, 2014 and August 26, 201 a for daily average flow; daily m kimum chlorine residual on the D monitoring period ending Marc	4. Specifically, the Respor aximum flow; minimum chl MR that was submitted for	ndent lorine
			Base Pe	enalty \$25,000
>> Environmental, Prope				
Release		Harm oderate Minor		
OR Actual			-	
Potential	<u> </u>		Percent 0.0%	
>>Programmatic Matrix				
Falsification	Major Mo	oderate Minor		
	<u>L</u>	X	Percent 1.0%	
Makain				
Matrix Notes	More than	70% of the rule requirements w	ere met.	
		A	djustment \$2	4,750
				\$250
				\$230
Violation Events				
Number of '	Violation Events	1 171	Number of violation days	3
	<u> </u>		<u></u>	
	daily weekly			
	monthly			
mark only one with an x	quarterly		Violation Base Pe	nalty \$250
-	semiannual			
-	annual single event			
F==0.00				
	Or	ne single event is recommended.		
	<u> </u>	te single event is recommended.		
Good Faith Efforts to Com		NOE/NOV NOE/NOV to EDPRP/Settlen		action \$0
777	Extraordinary			
verwywy verw	Ordinary			
AMMANANA AM	N/A	X (mark with x)		
	Notes	Respondent does not meet the this violation.	good faith criteria for	
		-	Violation Sub	ototal \$250
Economic Benefit (EB) for	this violation		Statutory Limit Te	st
Fetimat	ed EB Amount	\$1	Violation Final Penalty	
Locinat			-	
		This violation Final Assessed	renaity (adjusted for li	mits) \$300

	9461			**********	:		
t <mark>eg. Ent. Reference No.</mark> R Media V							
Media V	N101517589						
	Vater Quality					Percent Interest	Years of
Violation No. 8	3					reitem mierest	Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Vrc	Interest Saved	000000000000000000000000000000000000000	EB Amount
Item Description		Date Required	imai vate		Interest Saveu	Onedine Costs	LD AIIIOUIIL
item bescription	NO COMBINAS OF S						
5 J J 6 J .							
Delayed Costs Equipment		1		0.00	\$0 T	\$0	\$0
Buildings	, ministrati di sessi unios è su			0.00	\$0 \$0	\$0 \$0	\$0 \$0
Other (as needed)				0.00	\$0	\$0 \$0	\$0 \$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$25						
	Estimated c (\$25 per 0	ost to submit a re MR) to include th	e values for dail	y aver	age flow; daily ma	ing March 31, 2014 ximum flow; minim	um chlorine
Notes for DELAYED costs	Estimated c (\$25 per £ residual; an Date is the	ost to submit a re MR) to include the d maximum chlor compliance date.	evised DMR for the values for dailing residual. Dailing Estimated cost	he mor y aver ite Rec to upd j proce	nitoring period end age flow; daily ma quired is the date t late the Facility's o	ling March 31, 2014	to the TCEQ um chlorine ue. The Final and conduct
	Estimated c (\$25 per £ residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he more ly aver ite Rec to upd proce enefit o	nitoring period end age flow; daily ma quired is the date t late the Facility's o dures are properly of Violation No. 6. ng item (except l	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance	to the TCEQ um chlorine ue. The Final and conduct aptured in the
Notes for DELAYED costs Avoided Costs Disposal	Estimated c (\$25 per £ residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he mon y aver ate Rec to upd proce enefit (nitoring period end age flow; daily ma quired is the date t late the Facility's o dures are properly of Violation No. 6. ng item (except)	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance accomplished is ca for one-time avoid	to the TCEQ um chlorine ue. The Final and conduct aptured in the ded costs)
Notes for DELAYED costs Avoided Costs Disposal Personnel	Estimated c (\$25 per £ residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he more y averate Received to upday proceed enefit (0.00 0.00	nitoring period end age flow; daily ma quired is the date t late the Facility's o dures are properly of Violation No. 6.	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance accomplished is ca for one-time avoit \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0
Avoided Costs Disposal Personnel aspection/Reporting/Sampling	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he more y average to upd proceed to	nitoring period end rage flow; daily ma quired is the date t late the Facility's o dures are properly of Violation No. 6. ng item (except) \$0 \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final and conduct aptured in the ded costs) \$0 \$0 \$0
Avoided Costs Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he more to upd proceed on the content of the conten	nitoring period end rage flow; daily ma quired is the date t late the Facility's o edures are properly of Violation No. 6. ag item (except i \$0 \$0 \$0 \$0	ling March 31, 2014 ximum flow; minim that the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he money average avera	nitoring period end age flow; daily ma quired is the date t late the Facility's o dures are properly of Violation No. 6. ng item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoil \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	ne more y averate Recto updo procee enefit (0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	nitoring period end age flow; daily ma quired is the date t late the Facility's of dures are properly of Violation No. 6. ag item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel aspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2]	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	he money average avera	nitoring period end age flow; daily ma quired is the date t late the Facility's o dures are properly of Violation No. 6. ng item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoil \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel nspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	ne more y averate Recto updo procee enefit (0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	nitoring period end age flow; daily ma quired is the date t late the Facility's of dures are properly of Violation No. 6. ag item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	ne more y averate Recto updo procee enefit (0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	nitoring period end age flow; daily ma quired is the date t late the Facility's of dures are properly of Violation No. 6. ag item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	ne more y averate Recto updo procee enefit (0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	nitoring period end age flow; daily ma quired is the date t late the Facility's of dures are properly of Violation No. 6. ag item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	ne more y averate Recto updo procee enefit (0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	nitoring period end age flow; daily ma quired is the date t late the Facility's of dures are properly of Violation No. 6. ag item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$
Avoided Costs Disposal Personnel spection/Reporting/Sampling Supplies/Equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	Estimated c (\$25 per C residual; an Date is the employee tr	ost to submit a repart of the submit a repart of the submit of the submi	evised DMR for the values for daining residual. Daine residual. Daine residual de Estimated cost that all reporting Economic B	ne more y averate Recto updo procee enefit (0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	nitoring period end age flow; daily ma quired is the date t late the Facility's of dures are properly of Violation No. 6. ag item (except \$0	ling March 31, 2014 ximum flow; minim hat the DMR was di perational guidance v accomplished is ca for one-time avoid \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	to the TCEQ um chlorine ue. The Final e and conduct aptured in the ded costs) \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$

·	Efflu	ent Violations Table				
Quarters, LLC						
	RN10151758	89; Docket 2014-1498-M	WD-E			
	TPDES I	Permit No. WQ <mark>0012318</mark> 0	001			
	Enterococci Maximum Concentration Single Grab	Chlorine Residual Minimum Concentration Single Grab	Dissolved Oxygen Minimum Concentration Single Grab			
Month/ Year	Limit = 104 colonies per 100 ml	Limit = 1.0 mg/L	Limit = 4.0 mg/L			
August 21, 2014	400	0.00	3.38			

ml = millilitersmg/L = milligrams per liter



EQ Compliance History Report

PUBLISHED Compliance History Report for CN600793145, RN101517589, Rating Year 2014 which includes Compliance History (CH) components from September 1, 2009, through August 31, 2014.

Customer, Respondent, CN600793145, Quarters, LLC

Classification: SATISFACTORY

Rating: 6.14

or Owner/Operator: Regulated Entity:

RN101517589, JACINTOPORT INDUSTRIAL DEVELOPMENT WWTP Classification: SATISFACTORY

Rating: 6.14

Complexity Points:

Repeat Violator: NO

CH Group:

08 - Sewage Treatment Facilities

Location:

In the Jacintoport Industrial Development, approximately 1.5 miles southwest of the confluence of the Houston

Ship Channel and Carpenter's Bayou in the eastern part of Harris County, Texas

TCEQ Region:

REGION 12 - HOUSTON

ID Number(s):

WASTEWATER PERMIT WQ0012318001

WASTEWATER EPA ID TX0117897

Compliance History Period: September 01, 2009 to August 31, 2014

Rating Year: 2014

Rating Date: 09/01/2014

Date Compliance History Report Prepared: January 26, 2015

Agency Decision Requiring Compliance History: Enforcement

Component Period Selected: January 26, 2010 to January 26, 2015

TCEO Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: Jill Russell

Phone: (512) 239-4564

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period?

YES NO

2) Has there been a (known) change in ownership/operator of the site during the compliance period?

3) If YES for #2, who is the current owner/operator?

N/A

4) If YES for #2, who was/were the prior

N/A

owner(s)/operator(s)?

1

5) If YES, when did the change(s) in owner or operator N/A occur?

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

Effective Date: 10/02/2011 ADMINORDER 2011-0565-MWD-E (1660 Order-Agreed Order With Denial)

Classification: Moderate

Citation: 2D TWC Chapter 26, SubChapter A 26.121(a)(1)

30 TAC Chapter 305, SubChapter F 305.125(1)

Rgmt Prov: Eff. Limit. & Monit. Req. No. 1 PERMIT

Description: Failure to comply with permitted effluent limitations as documented during a record review on March 1, 2011.

Classification: Moderate

Citation: 30 TAC Chapter 305, SubChapter F 305.125(1)

30 TAC Chapter 305, SubChapter F 305.125(17)

30 TAC Chapter 319, SubChapter A 319.7(d)

Rgmt Prov: Effluent Reporting Requirements PERMIT

Monit. & Reporting Req. No. 1 PERMIT

Description: Failure to timely submit the DMR for the monitoring period ending June 30, 2010, by the 20th day of the following month.

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

Item 1	February 19, 2010	(930339)	Item 29	September 28, 2012	(1039838)
Item 2	March 19, 2010	(930340)	Item 30	October 19, 2012	(1069590)
Item 3	April 22, 2010	(930341)	Item 31	November 20, 2012	(1069591)
Item 4	May 19, 2010	(835950)	Item 32	December 20, 2012	(1069592)
Item 5	June 20, 2010	(847830)	Item 33	January 18, 2013	(1082861)
Item 6	July 20, 2010	(862236)	Item 34	February 20, 2013	(1082860)
Item 7	August 20, 2010	(868839)	Item 35	March 20, 2013	(1091176)
Item 8	September 17, 2010	(875708)	Item 36	April 19, 2013	(1097513)
Item 9	January 19, 2011	(903942)	Item 37	May 20, 2013	(1108539)
Item 10	February 21, 2011	(910831)	Item 38	June 20, 2013	(1112111)
Item 11	March 18, 2011	(918094)	Item 39	July 17, 2013	(1119051)
Item 12	March 31, 2011	(930342)	Item 40	August 30, 2013	(1126820)
Item 13	May 19, 2011	(939800)	Item 41	September 20, 2013	(1131350)
Item 14	June 20, 2011	(947214)	Item 42	October 18, 2013	(1137101)
Item 15	July 19, 2011	(954471)	Item 43	November 18, 2013	(1142517)
 Item 16	August 29, 2011	(961053)	Item 44	January 17, 2014	(1155033)
Item 17	September 20, 2011	(967143)	Item 45	February 28, 2014	(1162343)
Item 18	October 19, 2011	(973109)	Item 46	March 24, 2014	(1168968)
Item 19	November 19, 2011	(979232)	Item 47	April 22, 2014	(1176148)
Item 20	December 15, 2011	(986078)	Item 48	May 22, 2014	(1182385)
Item 21	January 20, 2012	(992436)	Item 49	June 20, 2014	(1189271)
Item 22	February 17, 2012	(999745)	Item 50	June 27, 2014	(1182386)
Item 23	March 19, 2012	(1005291)	Item 51	July 18, 2014	(1194700)
Item 24	April 18, 2012	(1011862)	Item 52	August 26, 2014	(1201213)
Item 25	May 18, 2012	(1018231)	Item 53	September 25, 2014	(1213981)
Item 26	June 19, 2012	(1025959)	Item 54	November 21, 2014	(1220227)
Item 27	July 20, 2012	(1033320)			
Item 28	September 20, 2012	(1048785)			

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

Texas Commission on Environmental Quality



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	TEXAS COMMISSION ON
QUARTERS, LLC	§	
RN101517589	§	ENVIRONMENTAL QUALITY

AGREED ORDER DOCKET NO. 2014-1498-MWD-E

I. JURISDICTION AND STIPULATIONS

On	, the Texas Commission on Environmental Quality ("the
Commission" or "TCE	Q") considered this agreement of the parties, resolving an enforcement
action regarding Quar	ters, LLC ("Respondent") under the authority of TEX. WATER CODE chs. 7
and 26. The Executive	Director of the TCEQ, through the Enforcement Division, and the
Respondent together s	tipulate that:

- 1. The Respondent owns a wastewater treatment plant located in the Jacintoport Industrial Development, approximately 1.5 miles southwest of the confluence of the Houston Ship Channel and Carpenter's Bayou in the eastern part of Harris County, Texas (the "Facility").
- 2. The Respondent has discharged municipal waste into or adjacent to any water in the state under Tex. Water Code ch. 26.
- 3. The Executive Director and the Respondent agree that the Commission has jurisdiction to enter this Agreed Order, and that the Respondent is subject to the Commission's jurisdiction.
- 4. The Respondent received notice of the violations alleged in Section II ("Allegations") on or about October 10, 2014.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by the Respondent of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

6. An administrative penalty in the amount of Thirty-Four Thousand Six Hundred Seventy-Five Dollars (\$34,675) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). The Respondent has paid Seven Hundred Ninety Dollars (\$790) of the administrative penalty and Six Thousand Nine Hundred Thirty-Five Dollars (\$6,935) is deferred contingent upon the Respondent's timely and satisfactory compliance with all the terms of this Agreed Order. If the Respondent fails to timely and satisfactorily comply with all requirements of this Agreed Order, including the payment schedule, the Executive Director may require the Respondent to pay all or part of the deferred penalty.

The remaining amount of Twenty-Six Thousand Nine Hundred Fifty Dollars (\$26,950) of the administrative penalty shall be payable in 35 monthly payments of Seven Hundred Seventy Dollars (\$770) each. The next monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall each be paid not later than 30 days following the due date of the previous payment until paid in full. If the Respondent fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, the Executive Director may, at the Executive Director's option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, the failure of the Respondent to meet the payment schedule of this Agreed Order constitutes the failure by the Respondent to timely and satisfactorily comply with all the terms of this Agreed Order.

- 7. Any notice and procedures, which might otherwise be authorized or required in this action, are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director and the Respondent agree on a settlement of the matters alleged in this enforcement action, subject to final approval in accordance with 30 TEX. ADMIN. CODE § 70.10(a).
- 9. The Executive Director recognizes that:
 - a. On May 22, 2014, the Respondent submitted the discharge monitoring reports ("DMRs") for the monitoring periods ending November 30, 2013; January 31, 2014; February 28, 2014; March 31, 2014; and April 30, 2014.
 - b. By October 10, 2014, the Respondent installed an additional lift station pump in the onsite lift station to ensure firm pumping capacity.
 - c. By October 13, 2014, the Respondent removed and properly disposed of the sludge in the chlorine contact basin.
 - d. By October 21, 2014, the Respondent replaced the reduced-pressure principal backflow prevention assembly ("RPBA").
 - e. By October 22, 2014, the new RPBA was inspected, tested and certified as passing by a licensed backflow assembly tester.

- f. By November 3, 2014, the Respondent installed a new backup blower.
- g. By November 13, 2014, the Respondent replaced the leaking valve on the clarifier drain pipe; properly disposed of wastewater that had leaked around the clarifier drain pipe; and disinfected the area.
- h. On November 18, 2014, the Respondent submitted a revised DMR that included the values for daily average flow; daily maximum flow; minimum chlorine residual; and maximum chlorine residual for the monitoring period ending March 31, 2014.
- 10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
- 11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

II. ALLEGATIONS

As owner of the Facility, the Respondent is alleged to have:

- 1. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 Tex. Admin. Code § 305.125(1) and (5), and Texas Pollutant Discharge Elimination System ("TPDES") Permit No. WQ0012318001, Operational Requirements No. 1, as documented during an investigation conducted on August 21, 2014. Specifically, while appurtenances were installed in the onsite lift station for a second lift pump, a second lift pump was not provided.
- 2. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001, Operational Requirements No. 1, as documented during an investigation conducted on August 21, 2014. Specifically, the reduced-pressure principal backflow prevention assembly ("RPBA") was leaking.
- 3. Failed to ensure that the Facility and all of its systems of collection, treatment, and disposal are properly operated and maintained, in violation of 30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001, Operational Requirements No. 1, as documented during an investigation conducted on August 21, 2014. Specifically, the sludge blanket level in the clarifier was six feet in a total water depth of nine feet; the crossbeam supporting the clarifier drive was rusted through; the chlorine contact basin contained one foot of sludge in a total water depth of eight feet; the

aeration basin had approximately eight inches of freeboard; the access walkway was equipped with a handrail on only one side of the catwalk; the existing handrail did not have a midrail; and the backup blower was inoperable.

- 4. Failed to prevent the unauthorized discharge of wastewater into or adjacent to any water in the state, in violation of Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1) and (5), and TPDES Permit No. WQ0012318001, Permit Conditions No. 2.g and Operational Requirements No. 1, as documented during an investigation conducted on August 21, 2014. Specifically, a valve on the clarifier drain pipe was leaking wastewater onto the ground.
- 5. Failed to comply with permitted effluent limits, in violation of Tex. Water Code § 26.121(a)(1), 30 Tex. Admin. Code § 305.125(1), and TPDES Permit

 No. WQ0012318001, Effluent Limitations and Monitoring Requirements Nos. 1, 2, and 6, as documented during an investigation conducted on August 21, 2014, and shown in the table below:

	Effl	uent Violations Table	
	Enterococci Maximum Concentration Single Grab	Chlorine Residual Minimum Concentration Single Grab	Dissolved Oxygen Minimum Concentration Single Grab
Month/ Year	Limit = 104 colonies per 100 ml	Limit = 1.0 mg/L	Limit = 4.0 mg/L
August, 21 2014	400	0.00	3.38

ml = milliliters mg/L = milligrams per liter

- 6. Failed to retain monitoring and reporting records at the Facility or make them readily available for review by a TCEQ representative, in violation of 30 Tex. ADMIN. CODE §§ 305.125(1) and (11)(b) and 319.7(c), and TPDES Permit No. WQ0012318001, Monitoring and Reporting Requirements No. 3.b, as documented during an investigation conducted on August 21, 2014 and August 26, 2014. Specifically, laboratory reports and operator logs from the months of November 2013 and March 2014 and the certificate for the Facility's RPBA were not provided for review.
- 7. Failed to timely submit DMRs at the intervals specified in the permit, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (17), and 319.7(d), and TPDES Permit No. WQ0012318001, Monitoring and Reporting Requirements No. 1, as documented during an investigation conducted on August 21, 2014 and August 26, 2014. Specifically, the DMRs for the monitoring periods ending November 30, 2013; January 31, 2014; February 28, 2014; March 31, 2014; and April 30, 2014 were not submitted by the 20th day of the following month.

8. Failed to accurately complete DMRs, in violation of 30 Tex. Admin. Code §§ 305.125(1) and (17), and 319.1, and TPDES Permit No. WQ0012318001 Monitoring and Reporting Requirements No. 1, as documented during an investigation conducted on August 21, 2014 and August 26, 2014. Specifically, the Respondent failed to report data for daily average flow; daily maximum flow; minimum chlorine residual; and maximum chlorine residual on the DMR that was submitted for the monitoring period ending March 31, 2014.

III. DENIALS

The Respondent generally denies each allegation in Section II ("Allegations").

IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that the Respondent pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Quarters, LLC, Docket No. 2014-1498-MWD-E" to:

Financial Administration Division, Revenue Operations Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. It is further ordered that the Respondent shall undertake the following technical requirements:
 - a. Within 30 days after the effective date of this Agreed Order, update the Facility's operational guidance and conduct employee training to ensure that:
 - i. Monitoring and reporting records, including operator logs and laboratory reports, are maintained in a manner so that they are readily available for review by TCEQ representatives upon request;
 - ii. Self-reporting requirements are properly accomplished, including the timely submittal of complete and accurate DMRs; and
 - iii. Sludge in the chlorine contact basin is removed and properly disposed of.
 - b. Within 45 days after the effective date of this Agreed Order, submit written certification of compliance with Ordering Provisions Nos. 2.a.i through 2.a.iii, in accordance with Ordering Provision No. 2.g below.

- c. Within 60 days after the effective date of this Agreed Order, develop and implement a solids management plan ("SMP"). The SMP shall include a program of internal process control testing to monitor the efficiency of the Facility and to maintain the proper solids balance. The SMP shall provide procedures designed as guidance for the operator to act on as a result of process control tests, to properly adjust the solids balance, and to determine sludge wasting rates. The SMP shall be prepared by a registered Texas Professional Engineer or an "A" TCEQ Certified Wastewater Operator.
- d. Within 75 days after the effective date of this Agreed Order, submit written certification of compliance with Ordering Provision No. 2.c, including a copy of the SMP, in accordance with Ordering Provision No. 2.g below.
- e. Within 150 days after the effective date of this Agreed Order:
 - i. Submit written certification of compliance with the permitted effluent limits of TPDES Permit No. WQoo12318001, including specific corrective actions that were implemented at the Facility to achieve compliance and copies of the most current self-reported discharge monitoring reports, demonstrating at least three consecutive months of compliance with the permitted effluent limits, in accordance with Ordering Provision No. 2.g below:
 - ii. Begin maintaining a minimum of eighteen inches of freeboard in the aeration basin;
 - iii. Repair or replace the crossbeam supporting the clarifier drive; and
 - iv. Install an additional handrail to the access walkway of the aeration basin and install a midrail for the existing handrail.
- f. Within 165 days after the effective date of this Agreed Order, submit written certification of compliance with Ordering Provisions Nos. 2.e.ii through 2.e.iv, in accordance with Ordering Provision No. 2.g below.
- g. The written certifications of compliance required by Ordering Provisions Nos. 2.b, 2.d, 2.e.i, and 2.f shall include detailed supporting documentation including photographs, receipts, and/or other records to demonstrate compliance shall be notarized by a State of Texas Notary Public, and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

The certifications shall be submitted to:

Order Compliance Team Enforcement Division, MC 149A Texas Commission on Environmental Quality P.O. Box 13087 Austin, Texas 78711-3087

with a copies to:

Water Section Manager Houston Regional Office Texas Commission on Environmental Quality 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

- 3. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
- 4. If the Respondent fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, the Respondent's failure to comply is not a violation of this Agreed Order. The Respondent shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. The Respondent shall notify the Executive Director within seven days after the Respondent becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by the Respondent shall be made in writing to the Executive Director. Extensions are not effective until the Respondent receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 6. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to:
 (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 7. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature

could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under Tex. Bus. Org. Code § 1.002.

8. Pursuant to 30 Tex. Admin. Code § 70.10(b) and Tex. Gov't Code § 2001.142, the effective date of this Order is the date it is signed by the Commission. A copy of this fully executed Order shall be provided to each of the parties.

For the Commission

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

	For the Executive Director 1/8/16 Date
	I, the undersigned, have read and understand the attached Agreed Order. I am authorized to agree to the attached Agreed Order on behalf of the entity indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.
	 I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in: A negative impact on compliance history; Greater scrutiny of any permit applications submitted; Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency; Increased penalties in any future enforcement actions; Automatic referral to the Attorney General's Office of any future enforcement actions; and TCEQ seeking other relief as authorized by law. In addition, any falsification of any compliance documents may result in criminal prosecution.
<	Frank D. Hamilton 8/28/15 Signature Date
	RANK H. HAMILTON Name (Printed or typed) Authorized Representative of Quarters, LLC MANAGER Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section IV, Paragraph 1 of this Agreed Order.